

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 24-cr-20048

Hon. Mark A. Goldsmith

REGINALD MORRIS,

Defendant.

_____/

**GOVERNMENT'S SUPPLEMENTAL BRIEF REGARDING
DANGEROUSNESS RELATING TO DEFENDANT'S MOTION TO
DISMISS COUNTS EIGHT AND TEN OF INDICTMENT AS
UNCONSTITUTIONAL (ECF No. 102)**

During the February 14, 2024 detention hearing before Magistrate Judge Anthony P. Patti, government counsel proffered facts about the instant offense and, when doing so, played several recordings of Reginald Morris discussing drug trafficking, describing his access to firearms, and threatening to use those firearms to confront drug trafficking coconspirators. *See* Audio, ECF No. 35; Transcript, ECF No. 133. Portions of that detention hearing are described below as well as other evidence of Morris's dangerousness.

Drug Trafficking

Morris played an instrumental role procuring, shipping, and tracking the two packages of methamphetamine that were seized and form the basis for the methamphetamine charges against Morris in the Indictment. On October 18, 2023, an officer observed Morris outside a UPS store in Los Angeles shortly before codefendant Ajeet Dhillon entered the UPS store to ship the two packages. *See* ECF No. 133, PageID.1002. Prior to the packages being shipped, Morris was intercepted discussing the destination addresses for the two packages. ECF No. 133, PageID.1002-1003. After the packages were shipped, Morris was intercepted discussing tracking information related to the packages, including information from third-party trackers that the conspirators placed in the packages. ECF No. 133, PageID.1003.

On November 15, 2023, when Morris's residence was searched, officers found a cutting station in the garage. *See* ECF No. 133, PageID.1011. According to government counsel's proffer, based on information from case agents, a cutting station is a station where cutting material could be mixed with heroin and fentanyl when

preparing and manufacturing drugs. *See id.* Officers also found a drug press in the garage that contained 310 grams of fentanyl. *Id.*

Morris's stepfather (or father) is codefendant Tyrone Thurmond, Sr. (aka Pops or Daddy). ECF No. 133, PageID.1001. Thurmond, Sr. stated that Morris had access to and sometimes stayed at Thurmond, Sr.'s residence. ECF No. 133, PageID.1010. On November 15, 2023, when Thurmond, Sr.'s residence was searched, officers found a press containing 81 grams of fentanyl.

Access to Firearms

Morris and codefendant Thurmond, Jr. have a mother in common, sometimes referred to as Mama. ECF No. 133, PageID.1001. On November 15, 2023, when Morris's mother's residence was searched, officers found mail addressed to Morris, which along with intercepted calls shows he had access to his mother's residence. *See* ECF No. 133, PageID.1009. Tracking data for Morris's phone corroborates that Morris frequented both Mama's residence and Pops' residence. ECF No. 133, PageID.1024.

During an intercepted October 23, 2023 call, Morris and codefendant Thurmond, Jr. discussed moving firearms from Pops' (codefendant Thurmond, Sr.'s) residence to Mama's residence. ECF No. 133, PageID.1008. During that call, they also discussed specific types of firearms, including an AR, a Draco, and a 5.7. *Id.* During an intercepted call earlier that day, they discussed straps and buttons at Daddy's residence, some of which they had moved to Mama's residence. *See* ECF No. 133, PageID.1007. According to government counsel's proffer, based on information from case agents, a strap, button or switch is a street term for a device that converts a handgun into a machine gun that shoots many bullets with one pull of the trigger (aka a Glock switch). *See* ECF No. 133, PageID.1005, 1007.

On November 15, 2023, when officers searched Mama's residence, they seized several firearms, most of which were in the open in an upstairs bedroom. *See* ECF No. 133, PageID.1009. The firearms included a 5.7 and several ARs, consistent with the specific types of firearms discussed on intercepted calls. *Id.* Officers also seized a Glock pistol with a switch that converts the pistol into a machine gun. *Id.* In

another upstairs bedroom, officers seized an armored plate vest with a plate and, from a downstairs bedroom, officers seized several additional firearms. *Id.*

On November 15, 2023, when officers searched Daddy's residence, they seized seven firearms. *See* ECF No. 133, PageID.1008. The weapons included two AK-47 style rifles, one of which was identified as an AK-47 Draco rifle, consistent with the specific types of firearms discussed on intercepted calls. *Id.*

Firearms in Furtherance of Drug Trafficking

During intercepted phone calls, Morris repeatedly threatened to confront drug trafficking coconspirators with a firearm, including firearms with a Glock switch.

During an October 23, 2023 call between Morris and codefendant Carl Vann, Morris talked about getting "Twin" (aka Martaze Davis, defendant in a methamphetamine conspiracy, *see* Case No. 24-cr-20054) down to the hood so Morris could put a "switch on his ass." *See* ECF No. 133, PageID.1003-1005. A few minutes later, during a call between Morris and codefendant Thurmond, Jr., Morris talks about "Twin" and

Morris wanting to confront “Twin” with a “button.” *See* ECF No. 133, PageID.1005. A few minutes later (on a different call), Morris asks codefendant Thurmond, Jr. to invite “Twin” down to the hood to purchase some “waters” (a street term for methamphetamine). *See* ECF No. 133, PageID.1006.

On November 1, 2023, Morris has a heated conversation with a defendant (indicted for drug trafficking in West Virginia) wherein Morris threatens the defendant to pay him (Morris) or else the defendant will “own” Morris’s gun, which, based on information from case agents, is a threat to use a firearm. *See* ECF No. 133, PageID.1006.

On November 2, 2023, Morris told codefendant Thurmond, Jr. that he (Morris) wanted to confront a person with the name “Mookie” with a gun. ECF No. 133, PageID.1007.

Other Criminal History

According to the Pretrial Services Report dated February 12, 2024 (prepared before the benefit of hearing the recordings described and played at the duty court detention hearing), Morris’s criminal history includes a June 4, 2008 arrest, June 13, 2008 guilty plea, and

September 4, 2008 sentencing (later converted to HYTA that was then revoked) for attempted controlled substance delivery / manufacture (cocaine, heroin, or another narcotic) less than 50 grams. The report also documents a July 10, 2012 arrest, May 2, 2014 guilty plea, and July 8, 2014 sentencing for multiple counts, including felony carrying concealed weapons. The report also documents a history of drug abuse, including a then current urinalysis with a presumed positive for marijuana, oxycodone, fentanyl, and opiates.

Respectfully submitted,

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Dated: May 14, 2025

Certification of Service

I certify that on May 14, 2025, I electronically filed the foregoing using the ECF system, which will send notification of such filing to all ECF participants.

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